



City of Santa Barbara

Community Development Department

Memorandum

DATE: May 10, 2012

TO: Historic Resources Element Task Force

FROM: Bettie Weiss, City Planner
John Ledbetter, Principal Planner
Jaime Limon, Senior Planner
Heather Baker, AICP Project Planner

SUBJECT: Staff Suggestions for Historic Resource Element (HRE)

On 4-18-12 the HRE Task Force reviewed suggestions on the Task Force's 3-9-12 Draft HRE. Some revisions were accepted, others were rejected and some were not discussed due to lack of time. Attached are staff's remaining comments on the draft HRE for Task Force consideration. The last set of suggested changes focused on a reorganization of the document. This set of suggested changes has a new focus on consistent, clear use of terms such as "neighborhood", "historic resource", and "historic area" so that it is clear which resources are protected by each policy and implementation item. Simple suggested insertions and deletions are included in tracked changes in the attached document, as well as some suggested comments. Comments are also provided in this memo for HRE Task Force consideration.

Comment 1. Goal & policy regarding neighborhood historic resources. Staff suggests a stronger emphasis on the historic resources in neighborhoods being preserved by adding the underlined words in the goal below. Without the added wording below, or something similar, a reader might interpret the goal to be broader neighborhood preservation, rather than neighborhood preservation within a historic resources context. Note, that the word "historic" is suggested to be inserted after the word "neighborhood" to indicate that it is historic resources **within** neighborhoods to be protected, not just entire historic neighborhoods, that merit protection.

- *Neighborhood Historic Preservation:* Protect the significant contribution made by Santa Barbara's neighborhood historic resources to the City's charm and sense of historical context.

HR9. **Protect Residential Neighborhood Historic Resources.** Identify the older residential neighborhoods in the city that have substantially maintained their original and historical character, and pursue measures to preserve that character. Protect such neighborhoods, including those in close proximity to the downtown and commercial cores, from development that might transform their historic character.

Comment 2. New items. In response to the HRE Task Force's request that staff carefully checked for anything that may have been "missing" from the draft HRE, two new items were suggested:

HR12.4 regarding designating identified resources expeditiously was accepted into the document on 4-18-12.

Policy 14 additional implementation item. A new item regarding coordinating reviews is suggested for inclusion in Policy 14 implementation items as 14.10. In addition, HR15 is suggested to be renumbered to be item 14.9, as shown below.

HR 14.9 **Ensure Uniformity of Regulation Application.** Assure that the requirements and restrictions administered by the Historic Landmarks Commission and the Architectural Board of Review shall be as equally applicable to projects undertaken by the city or other public agencies as they are to private projects.

HR 14.10 **Coordinate Reviews.** Coordinate reviews with other authorities so that County, State and Federal project reviews receive early concept reviews as a consulting party.

Comment 3. Clarifying Significance Level of Protected Resources. The following words and definitions were carefully considered and their use reviewed by staff throughout the document.

- Historic area
- Historic resource - designated
- Historic resource – eligible
- Historic resource - individual
- Historic resource – potential

The need to further refine the "historic resource" definition is so that it is clear which types of resources are protected by each policy and implementation item. Staff suggests that the definitions clarify that only historic resources which are designated, eligible for designation, on the potential historic resource list, or considered significant by CEQA are protected.

In addition, the definition of "historic feature" does not include that a historic feature is significant. Therefore, staff suggests clarifying that the historic features to be protected are those that are significant in items 10.2 and 11.1.

Comment 4. Confirmation of Resources Addressed by Policies. Please review the attached matrix. The matrix lists resource types on one axes and resource protection policies and implementation items on the other axes. Please confirm that the matrix is filled out accurately according to which policies and implementation items apply to each resource type. As a result of studying this matrix, staff has the following suggestions:

- Include all of these items within one simple definition of “historic areas”: groupings or concentrations of historic resources, an historic streetscape, resources in an older neighborhood which has maintained its original and historic character, or historic blocks. Use of these various terms in different policies or implementation items rather than just the one term “historic areas” may lead the reader to conclude that a different type of protection is warranted for each different phrase, when it appears to staff that the intention may be to protect all of these types of historic areas similarly. It will be much easier to implement the document with a simple use of either the term “historic areas” or “individual historic resources” where appropriate, with definitions of each provided in the list of definitions.
- If “traditional” and “historic” are interchangeable terms, only use the term “historic”. Please note that the definition of “historic” currently in the HRE denotes a broad use of the term. If the terms have important differences in meaning and the term, “traditional” needs to be used in the document, then define “traditional” in the list of definitions.
- The term “vulnerable” as used in 7.3 appears somewhat vague. Staff suggests deleting the term if possible. If not possible, then a definition of what is a vulnerable historic resource versus a typical historic resource would be helpful.
- Wherever protection of neighborhoods is referenced, consistently qualify the neighborhood in the same way, unless a difference in the type of neighborhood to be protected is intentional. For example, “substantially maintained its original and historic character” is noted in Policy 9, but not policy 8, but this difference does not appear intentional. Staff has suggested changes for greater consistency on this topic using tracked changes in the document.

Comment 5. Policy HR9 “Protect Traditional Neighborhoods”. Staff will provide the following comment to the Historic Landmarks Commission and Planning Commission regarding Policy HR9 “Protect Traditional Neighborhoods”.

This important policy addresses protection of traditional neighborhoods and could be implemented in a number of ways. Implementation item HR4.4 would entail a rezoning process. Staff would like to note that in the event that such a process is undertaken at some time in the future, one essential part of that study will be review for consistency within the General Plan as a whole as well as conformance to State Planning and Zoning laws. Staff does not suggest any revision to the language of Policy HR9, but provides this note, which will be repeated in staff comments to the Historic Landmarks Commission, Planning Commission and City Council.

Comment 6. Combining Policies Where Appropriate. The most important staff comment continues to be regarding the organization of the policies and implementation items. Staff recommends the following policy combining and will likely continue to recommend these changes to the Historic Landmarks Commission and the Planning Commission.

- Change the last policy “Ensure Uniformity of Regulation Application” to become the last implementation item of Policy 14 regarding “Assure Governmental Effectiveness”.
- Where resource protections are repeated for various types of resources, staff recommends that the implementation actions be combined together. Policies 1, 2, 3, 4 and 7 can be combined into two policies:
 1. Protect Historic and Archaeological Resources.
 2. Ensure compatible development adjacent to historic and archaeological resources.
- Part of policy 3, regarding identification of resources, can also be combined with policy 12 regarding surveying and identifying resources.

Examples of the benefit of this combining of policies are:

- **Viewscapes** addressed in three implementation action items (4.5, 7.1, and 8.3), could be in just one place.
- **Buffers** addressed in three implementation action items (1.1, 4.4 and 8.2), could be in just one place.
- **Flexible codes** addressed in three implementation action items (1.3, 5.3 and 6.3), could be in just one place.

Staff’s suggested revised outline, dated 5-10-12 reflects these policy combining suggestions.

Comment 7. Capitalization of “City”. Please note that the City Attorney’s Office has provided some specific direction as to when and when not to capitalize “City”. Prior to final printing, the capitalization of “city” throughout the document will be further reviewed and is likely to be revised in some instances.

Staff sincerely appreciates this opportunity to collaborate with the HRE Task Force.

Please let us know if you have any questions on how to review the document or if you need any clarifications. Heather Baker, AICP is available to answer question and can be reached by email at: HBaker@SantaBarbaraCA.gov.

We look forward to further discussing staff’s suggested edits and comments for consideration on 5-15-12 with the HRE Task Force.

HRE Staff Suggested Outline

5-10-12

Goals:

- Protection and Enhancement of Historical Resources
- Neighborhood Historic Resources Preservation
- Increased Awareness and Appreciation
- Governmental Cooperation

General Resource Protection Policies

- HR 1 Secure protection for both individual and areas of historic and archaeological resources
- HR 2 Ensure compatible and respectful development adjacent to historic and archaeological resources
- HR 3 Discourage demolition
- HR 4 Pursue adaptive reuse

Specific Historic Resource Protection Policies

- HR 5 Protect neighborhood historic resources
- HR 6 Protect historic landscapes
- HR 7 Protect historic streetscapes

Survey and Designations of Historic Resources Policy

- HR 8 Survey, document and designate historic resources

Public Education Policy

- HR 9 Increase awareness of Santa Barbara's heritage

Governmental Facilitation Policy

- HR 10 Assure governmental effectiveness